



## Bay Area Regional Water Recycling Program

Developing a regional partnership to maximize Bay Area water recycling.

Mr. Rick Breitenbach  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

September 23, 1999

RE: Comments on Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

The Bay Area Regional Water Recycling Program (BARWRP) is a partnership of federal, state, and local agencies dedicated to building consensus regarding the feasible use of recycled water in the San Francisco Bay Area. BARWRP is currently completing a Regional Master Plan for five counties of the Bay Area—San Francisco, San Mateo, Santa Clara, Alameda and Contra Costa. The Master Plan recommends implementation of a series of projects each year between now and 2010 that will provide a new water supply of about 125,000 acre feet per year.

The Master Plan recommendations for project phasing were developed by conducting a comprehensive assessment of economic feasibility, including a comparison of the projected value of the benefits of serving various recycled water uses versus projected costs. The recommended projects identified in the Master Plan were evaluated for public acceptance, public policy and environmental feasibility, in addition to economic feasibility, and for each of these three areas, the Master Plan identifies follow-up issues that must be addressed prior to final project definition and prior to implementation. The participating agencies' Executive Management Board has decided to continue the BARWRP feasibility efforts for one year past the completion of the Master Plan to address the identified issues.

Comments from BARWRP's Executive Management Board on CALFED's Draft EIS/EIR of June 1999 are summarized as follows:

- **Executive Summary.** "Water recycling offers significant potential to improve water supply reliability for California, one of the primary objectives of the CALFED Program. ... Recycling creates a unique contribution to improved reliability by providing an additional source of water that is local rather than imported. Further, this source can be relatively resistant to drought, making it available when it is needed most. Perhaps most important, recycling often provides increased water for one beneficial use without reducing the water available for other beneficial uses. From a Bay-Delta perspective, recycling projects in export areas increase water supply without increasing Delta exports or reducing Delta outflow. Thus, water recycling projects can simultaneously help meet CALFED Program objectives for water supply reliability, water quality, and ecosystem restoration." This quotation is from page 6-1 of the CALFED Water Use Efficiency Program Plan.

BARWRP agrees wholeheartedly with this quotation, but if water recycling is such a good idea from the CALFED perspective, it should be specifically mentioned in the Executive Summary. The potential water yields, benefits, impediments, and need for funding for regional water recycling projects should be highlighted in the Executive Summary.

- **Implementation Plan.** The Stage 1 Actions include resolving water recycling limitations in years one to three and securing \$500 million in loan and/or grant funding for water recycling capital improvements. BARWRP suggests that more definition be provided in the CALFED Implementation Plan regarding resolution of the impediments to water recycling. The BARWRP Master Plan expands upon the discussion of impediments provided in the Water Use Efficiency Program Plan and offers implementation strategies for overcoming these impediments. These strategies should be incorporated into the CALFED Implementation Plan. The Draft Master Plan is currently available on the BARWRP web site ([www.recyclewater.com](http://www.recyclewater.com)). A Final Draft of the Master Plan will be available in early October. As indicated in the BARWRP Master Plan, the Bay Area needs about \$370 million for near-term implementation from state and federal sources to ensure delivery of the 125,000 acre feet of new water. Therefore, the \$500 million estimate referred to in the CALFED Implementation Plan is too low if that represents the water recycling funding needed statewide. We recommend that this estimate be increased to reflect results coming out of BARWRP and the regional water recycling study being conducted in southern California.
- **Water Use Efficiency Program Plan.** In general, the water recycling discussion included in the CALFED Water Use Efficiency Program Plan is much improved over the version in the previous Draft EIS/EIR. Please refer to the Final Draft of the BARWRP Master Plan for specifics regarding projected yields, types of uses, costs, value of benefits, and implementation issues/strategies for Bay Area water recycling projects.

The BARWRP Executive Management Board appreciates the opportunity to comment on the Draft EIS/EIR for the CALFED Bay-Delta Program. If you have any questions about BARWRP or the Regional Master Plan, please contact the BARWRP Program Coordinator, Randy Raines, at (925) 299-6733.

Sincerely,



Michael P. Carlin  
Water Resources and Planning Manager,  
San Francisco Public Utilities Commission  
Co-Chair, Executive Management Board  
Bay Area Regional Water Recycling Program

Cc: Don Birrer, BADA  
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